

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|-----------------------------|---|------------------|
| ADREA, LLC, |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| - against - |) | ECF Case |
| |) | |
| BARNES & NOBLE, INC., |) | 13-CV-4137 (JSR) |
| BARNESANDNOBLE.COM LLC, and |) | |
| NOOK MEDIA LLC, |) | NON-CONFIDENTIAL |
| |) | (REDACTED) |
| Defendants. |) | |
| |) | |
| |) | |

**SUPPLEMENTAL DECLARATION OF YUE-HAN CHOW IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Yue-Han Chow, declare under penalty of perjury as follows:

1. I am a member of the Bar of the State of New York and an associate at the law firm of Arnold & Porter LLP, attorneys for Defendants and Counterclaim-Plaintiffs Barnes & Noble, Inc., barnesandnoble.com llc, and NOOK Media LLC (collectively, "Defendants" or "B&N").
2. I make this supplemental Declaration in further support of Defendants' Motion for Summary Judgment.
3. Attached hereto as Exhibit E5, under seal pursuant to Protective Order, is a true and correct copy of excerpts from the deposition transcript of Brian Berg, taken on January 17, 2014.

4. Attached hereto as Exhibit F5, under seal pursuant to Protective Order, is a true and correct copy of an [REDACTED]
[REDACTED]

5. Attached hereto as Exhibit G5, under seal pursuant to Protective Order, is a true and correct copy of a [REDACTED]
[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York, this 21st day of February, 2014.



Yue-Han Chow

CERTIFICATE OF SERVICE

I, hereby certify that on February 21, 2014, copies of the Supplemental Declaration of Yue-Han Chow in Support of Defendants' Motion for Summary Judgment were caused to be served upon the following via ECF and email:

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Yue-Han Chow